



217/782-6762

Refer to: 1630450034 -- St. Clair County
Pfizer Pigments, Inc.
ILD006307119
Log #: D-049
Generator File

US EPA RECORDS CENTER REGION 5



550915

February 5, 1988

Pfizer Pigments, Inc.
Attn: Roger E. Rader, Plant Manager
2001 Lynch Avenue
East St. Louis, IL 62205

Dear Mr. Rader:

This is in response to your letter dated December 7, 1987, describing a spill of spent ferrous chloride pickle liquor at the above referenced facility, which has been reviewed by this Agency as a special waste determination request. The Permit Section of the Division of Land Pollution Control, IEPA agrees with your conclusion that the waste resulting from this spill is a special waste but not a RCRA hazardous waste. We have reached our determination that this material is a non-hazardous special waste by the line of reasoning outlined below:

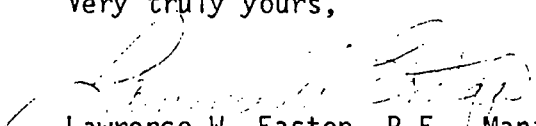
1. In accordance the letters, dated August 27, 1987 and October 23, 1987, from this Agency to you, the spent pickle liquor used in your operation is an effective substitute for a commercial product and is thus neither a hazardous waste nor a solid waste pursuant to 35 Ill. Adm. Code 721.102(e)(1)(B).
2. Therefore, the spent pickle was not a waste until it was spilled and the waste resulting from the spill was a RCRA "listed" hazardous waste (K062) until it was lime stabilized and thereby exempt as a listed hazardous waste under 35 IAC, 721.103(c)(2)(B).
3. After being lime stabilized the waste became a pollution control waste (a subcategory of special waste) as defined by 35 IAC 809.103 and as such would be a hazardous waste only if it were characteristically hazardous.
4. The analytic results from testing a previous spill, which were attached to your December 7, 1987 letter, have been determined by this Agency to be adequate to demonstrate that the waste from the current spill is a non-hazardous special waste.




Page 2

If you have any questions regarding this matter, please call Chris Liebman of my staff at 217/782-6762.

Very truly yours,


Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:CJL:bls/0014j,21,22

cc:  Southern Region
Tom Powell, Southern Region
Chuck Brutlag, ERU with a copy of FOS' comments
Rob Watson